

ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
- Southern Division -

UNITED STATES OF AMERICA

v.

SEANDELL HECTOR, Defendant.

CR. CASE NO. PX-16-564  
-CASE UNDER SEAL-

**MOTION FOR AUTHORIZATION FOR INTERNATIONAL TRAVEL  
AND FOR THE TEMPORARY RELEASE OF HIS U.S. PASSPORT  
WITH INCORPORATED MEMORANDUM OF POINTS AND AUTHORITIES**

COMES NOW Defendant, Seandell Hector, by and through his attorney, Allen H. Orenberg, of The Orenberg Law Firm, P.C., and hereby respectfully moves this Honorable Court for the entry of an Order granting authorization for international travel and for the temporary release of his U.S. passport, so that defendant, Seandell Hector, may travel abroad as more fully described below.

1. On December 2, 2016, Defendant Seandell Hector voluntarily pled guilty to a one count Information, charging him with intentional damage to a protected computer in violation of 18 U.S.C. § § 1030(a)(4) and (c)(3)(A). A sentencing hearing date has not yet been scheduled.
2. On December 2, 2016, the Court released the defendant on his personal regognizance with several conditions, including the requirement that he surrender his U.S. passport to the U.S. District Court Clerk's Office. The defendant reports he voluntarily surrendered his U.S. passport to the Clerk's Office on December 5, 2016.
3. Undersigned counsel has discussed this instant motion with Assistant U.S. Attorney Nicolas Mitchell. The U.S. Attorney's office defers to the Court on this Motion.

4. The defendant, Seandell Hector, is requesting the Court's authorization for international travel for the period of time commencing on June 23, 2017, through June 27, 2017. This will be a family trip to the Country of Trinidad & Tobago, so that the defendant may attend the 80th birthday celebration for his grandfather; Mr. Morris Guy. A copy of the invitation is attached as an exhibit.

5. Mr. Hector has not yet finalized his air travel plans, pending the Court's authorization for international travel as request herein. If the Court grants this request, the defendant will provide his air travel plans to undersigned counsel and/or to the U.S. Pre-Trial Services Agency. He plans to travel to/from Trinidad & Tobago with other family members from the Washington, D.C., metropolitan area.

6. Mr. Hector relates that this is a "low-budget" trip utilizing economy airfare and either staying with immediate family on his grandfather's estate and/or modestly priced hotels. Counsel has the address of the grandfather's estate and the telephone numbers for several members of the defendant's family who will be attending the celebration. If requested, counsel will provide this information to the Court and/or the U.S. Attorney's Office and/or the U.S. Pre-Trial Services Agency.

7. Mr. Hector is proposing to the court a suitable travelling third party custodian -- Mr. Keron Hector. Undersigned counsel has spoken with this gentleman. He relates he is the defendant's cousin, a U.S. citizen who reside in Cheverly, Maryland, and that he has no criminal record. Furthermore, Keron Hector states if his cousin is granted permission by this Court to travel abroad as requested, they will travel together from the Washington D/C. area to Trinidad & Tobago. However, Keron Hector plans to stay in Trinidad & Tobago beyond June 27, 2017, but he will assist and accompnay the defendant to the international airport in Trinidad & Tobago for his return flight back to the United States/Washington. D.C. area.



If requested, Keron Hector is amenable to appearing in the U.S. District Court for the District of Maryland if a hearing on this motion is scheduled by the Court.

8. The defendant assures the Court that he while he is abroad, he will stay in contact (on a weekly basis or as otherwise directed by his U.S. Probation Officer and undersigned counsel by way of e-mail and/or telephone, and he will otherwise comply with all of the the terms and conditions of this Court's Release order of December 2, 2016

9. It is counsel's understanding Mr. Hector is in full compliance with the terms of the Court's Release Order of December 2, 2016, including the surrender of his U.S. passport to the U.S. District Court Clerk's Office on December 5, 2016.

10. It is counsel's understanding a viable Extradition Treaty exists between the United States and the country of Trinidad & Tobago. A copy of this Treaty is attached as an exhibit.

11. If the Court grants this request for international travel, the defendant will need to have his U.S. passport in order to travel abroad. He is asking that the Court instruct the Clerk's Office to release the U.S. passport to him on or before June 21, 2017.

12. The defendant, Seandell Hector, will notify his the U.S. Probation Officer that he has indeed returned to the United States, within forty-eight (48) hours of his return to the United States.

13. Furthermore, the defendant will surrender his U.S. passport to the U.S. District Court Clerk's Office (Greenbelt, MD) within forty-eight (48) hours of his return to the United States.

WHEREFORE, for the foregoing and any other reasons that may appear just and proper, undersigned counsel respectfully moves this Honorable Court for the entry of an Order granting to the defendant, Seandell Hector, authorization for international travel and for the temporary release of his U.S. passport.

Respectfully submitted,

THE ORENBERG LAW FIRM, P.C.



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Counsel for Seandell Hector

**CERTIFICATE OF SERVICE**

I hereby certify that on the 9<sup>th</sup> June, 2017, a copy of the foregoing Motion for Authorization for International Travel and for the Temporary Release of his U.S. Passport with Incorporated Memorandum Of Points And Authorities, along with a proposed Order, was served by hand delivery or by e-mail or by U.S. mail or by fax, to:

AUSA Nicolas Mitchell  
U.S. Attorney's Office  
6404 Ivy Lane, 8<sup>th</sup> Floor  
Greenbelt, Maryland 20770-1249

USPO Scott Holtzer  
U.S. Probation Office  
U.S. Courthouse  
6500 Cherrywood Lane  
Greenbelt, Maryland 20770



Allen H. Orenberg